## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

In re:	)
INTERSTATE UNDERGROUND WAREHOUSE AND INDUSTRIAL	) Case No. 21-40834-DRD )
PARK, INC.,	) Chapter 11
Debtor.	)

### **LOCAL RULE 2015-2A and B STATEMENT**

COMES NOW Debtor herein and makes the following declarations pursuant to Local Rule 2015-2A and B, and declares the following based upon its personal knowledge and makes this declaration in support its Bankruptcy Petition:

#### A. Statement

- 1. No prior petition in bankruptcy has been filed on behalf of Debtor appointing a Trustee or Creditor's Committee.
- 2. There are actions or proceeding pending and judgments against Debtor as follows: **See Exhibit A** 
  - 3. No property of the Debtor is in the hands of a public officer, receiver, trustee, assignee for the benefit of creditors, mortgagee, pledgee, or assignee or rents.
  - 4. Debtors is not occupying any premises under a lease.
  - 5. Debtor uses the following Utility companies: See Exhibit B

#### B. Operating Statements

- 1. Estimated gross revenue for the thirty (30) day period following filing of the Petition is not available at this time and Debtor shall supplement this statement in the future.
- 2. The estimated operating expenses for the thirty (30) day period following the filing of the Petition is not available at this time and Debtor shall supplement this statement in the future.

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3. The expected gain or loss for the thirty (30) day period following filing of the Petition is not available at this time and Debtor shall supplement this statement

in the future.

I, Leslie Reeder, CEO for Interstate Underground Warehouse and Industrial Park, Inc., the

Debtor in this proceeding, state under perjury under the laws of the United States that the foregoing

is true and correct.

Dated: July 1, 2021

/s/ Leslie Reeder

Leslie Reeder

Chief Executive Officer

# Exhibit A

# **List of Pending Lawsuits**

Case Name	Case Number	Status	Court
Jonathan Justus v. IUW	2116-CV01375	pending	16th Judicial Circuit Court, 415 E 12th, KCMO 64106
Nelywed Foods Inc. v. IUW	2116-CV02499	pending	16th Judicial Circuit Court, 415 E 12th, KCMO 64106
Reeder v. IUW, SJR, Leslie Reeder, Stacy Robinson	2016-CV12471	pending	308 W. Kansas, Indepence, MO
Young v. Park Reserve, et al	1916-CV02432	pending	415 E 12th St, KCMO Division 10
Morgan v. Park Reserve	1916-CV09195	pending	415 E 12th St, KCMO Division 7
Schulte v. Park Reserve, et al	1916-CV15246	pending	415 E 12th St, KCMO, Division 18
Custom Sleep Center v. IUW, et al	1916-CV25711	pending	Circuit Court of Jackson County
Bodine Ashner Builders v. IUW	1916-CV26147	pending	Circuit Court of Jackson County
Kline Van and Special v. IUW	1916-CV32949	pending	Circuit Court of Jackson County
IUW v. Pro Foundation	1616-CV25466	appeal	Circuit Court of Jackson County
1501 Condo LLC v. Park Reserve LLC	2016-CV19042	pending	Circuit Court of Jackson County
Cyrus Contractor	assignment	recorded against View at WB LLC & Harrisonville Senior Care Center	Circuit Court of Jackson County
James Wilson v. IUW	2016-CV17710	concluded	16th Judicial Circuit Court, 415 E 12th, KCMO 64106
IUW v. Idredge	2016-CV12179	concluded	Associate Circuit Court of Jackson County
Moharam Wahed v. IUW Self Storage	2116-09787	small claims - pending	Circuit Court of Jackson County, Small Claims
KC Munchles v. IUW	1916-CV2186	concluded	Circuit Court of Jackson County
Park Reserve HOA v. Park Reserve LLC	1916-CV14030	pending	415 E 12th St, KCMO Division 13
Park Reserve LLC v. Amina Ricca	2016-CV11882	dismissed	Circuit Court of Jackson County
City of Kansas City MO v. Park Reserve LLC	2016-CV01134	dismissed	Circuit Court of Jackson County
The View 2001 LLC v. Wayne Reeder	2016-CV11889	dismissed	Circuit Court of Jackson County
Kimberly Benson v. IUW Self Storage	1816-CV19746	pending	308 W. Kansas, Indepence, MO
City of Kansas City MO v. Seven at KC LLC	2116-CV03883	pending	415 E 12th St, KCMO Division 6
Citizens Bank & Trust Co. v. Park Reserve, LLC et al	2116-CV11199	pending	Circuit Court of Jackson County

### Exhibit B

### **List of Utility Providers**

KC Water 4800 E. 63<sup>rd</sup> Street Kansas City, MO 64130 816.513.1313

Evergy (electric) PO Box 219330 Kansas City, MO 64121 816.221.2323

Avid Communications (phone & internet) PO Box 414800 Kansas City, MO 64141 816.994.7050

Hook N Haul Dumpsters LLC (trash service) 704 Harrington Street Dearborn, MO 64439 816.800.2993